

September 25, 2006

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

**Re: D.T.E. 06-67**

Dear Secretary Cottrell:

I am enclosing the responses of Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid to the Department's First Set of Information Requests. Thank you very much for your time and attention to this matter.

Very truly yours,

  
Amy G. Rabinowitz

Cc: Joseph W. Rogers, Office of the Attorney General

Information Request DTE 1-1

Request:

The Company's filing at 2 states that "[b]eginning with the ISO-NE invoice for October 2005 monthly services, ISO-NE ... began assessing National Grid for GIS costs associated with its default service load." For the period October 2005 through the present, please provide the following information on a monthly basis:

- (a) How many dollars in GIS-related costs did ISO-NE assess to the Company for its default service load?
- (b) How much of the costs identified in (a) did the Company include in the calculation of its default service rates?
- (c) How much of the costs identified in (a) did MECo recover through its existing default service adjustment provision, M.D.T.E. No. 1062-C?
- (d) How much of the costs identified in (a) did the Company recover through other means and identify those means?
- (e) How much of the costs identified in (a) does MECo propose to recover through its amended default service adjustment provision, M.D.T.E. No. 1102?

Response:

- (a) Please refer to the Attachment to this response for a monthly itemization of amounts billed to the Company by ISO-NE related to GIS. To date, ISO-NE has billed the Company approximately \$123,000 for GIS costs for the service months of November 2005 through June 2006.
- (b) The Company has not included any of amounts identified in the attachment to this response in its default service rates.
- (c) The Company has not recovered any of the amounts identified in the attachment to this response through its existing default service adjustment provision, M.D.T.E. No. 1062-C.
- (d) The Company has not recovered any of the amounts identified in the attachment to this response through any other means.
- (e) The Company proposes to include the amounts identified in the attachment to this response, plus any future GIS costs billed to it by ISO-NE, through its amended default service adjustment provision, M.D.T.E. No. 1102.

Prepared by or under the supervision of: Theresa M. Burns

Massachusetts Electric Company  
Nantucket Electric Company

ISO-NE Charges for GIS  
October 2005 - September 2006

<u>Bill</u>		<u>Total</u>
<u>From</u>	<u>To</u>	
01-Oct-05	01-Nov-05	\$0.00
01-Nov-05	01-Dec-05	\$19,546.28
01-Dec-05	01-Jan-06	\$29,640.15
01-Jan-06	01-Feb-06	\$16,946.99
01-Feb-06	01-Mar-06	\$12,064.68
01-Mar-06	01-Apr-06	\$11,986.49
01-Apr-06	01-May-06	\$10,189.28
01-May-06	01-Jun-06	\$10,391.61
01-Jun-06	01-Jul-06	\$12,469.20
01-Jul-06	01-Aug-06	
01-Aug-06	01-Sep-06	
01-Sep-06	01-Oct-06	
October 2005 - September 2006		\$123,234.68

Source: Monthly ISO Invoice

Information Request DTE 1-2

Request:

On a going-forward basis, does the Company propose to include GIS-related costs in the calculation of its default service rates? Please provide a full explanation.

Response:

The Company has proposed to include an estimate of GIS-related costs in the calculation of its default service rates in its September 22, 2006 Default Service rate filing in Docket No. D.T.E. 99-60. The amounts that have been proposed to be included are relatively small and have a very minor impact to default service rates.

For ease of reference, please refer to the attachment to this response which contains the last two pages of the Company's Attachment 2 to its September 22, 2006 filing. In this attachment, the Company is showing how it has estimated a likely amount which it would be billed for GIS costs by using the average monthly amount billed for GIS costs billed to the Company for the period November 2005 through June 2006, actual default service kWh deliveries for the same historic period, and an estimate of default service kWh deliveries contained in its September 22, 2006 Default Service rate filing (also in Attachment 2 to that filing). This approach assumes that the level of GIS costs being billed by ISO-NE as well as the Company's default service kWh deliveries remains at historic levels.

Since the period across which Default Service rates are designed are different between the residential/commercial customer group and the industrial customer group, the total amount estimated to be billed to the Company must be allocated between the residential/commercial customer group and the industrial customer group, and then translated to a six-month estimate for the residential/commercial customer group and a three-month estimate for the industrial customer group. This is calculated on page 2 to the attachment to this response using the historic Default Service kWh deliveries for the two groups. Once this is done, the applicable amounts need to be converted to per-kWh values, as is shown on page 1. The amounts are divided by the estimated Default Service kWh deliveries contained in the Company's September 22, 2006 Default Service rate filing to derive the amount per kWh proposed to be included in Default Service rates.

In its September 22, 2006 filing, the Company has proposed that Default Service rates for all Default Service customers include 0.001¢ per kWh associated with the recovery of GIS costs on a prospective basis beginning November 1, 2006.

Prepared by or under the supervision of: Theresa M. Burns

Massachusetts Electric Company  
Nantucket Electric Company

Illustrative Impact on Default Service Rates

		<u>Residential</u> (a)	<u>Commercial</u> (b)	Total Residential & <u>Commercial</u> (c)	<u>Industrial</u> (d)
(1)	Estimated GIS Costs				
	November 2006 - April 2007				
	November 2006 - January 2007			\$68,335	\$12,046
(2)	Estimated Default Service kWh Deliveries				
	November 2006 - April 2007	4,622,568,760	978,876,178	5,601,444,938	
	November 2006 - January 2007				721,189,444
(3)	Estimated Impact on Default Service Rates				
	November 2006 - April 2007			\$0.00001	
	November 2006 - January 2007				\$0.00001

- (1) Column (c): Page 2, Column (b), Line (4)  
Column (d): Page 2, Column (c), Line (5)  
(2) September 22, 2006 Default Service Rate Filing, DTE 99-60, Attachment 2  
(3) Line (1) ÷ Line (2), truncated after 5 decimal places

Massachusetts Electric Company  
Nantucket Electric Company

ISO-NE Charges for GIS  
October 2005 - June 2006

Bill		Default Service kWh			
<u>From</u>	<u>To</u>	<u>Total</u>	<u>Residential &amp; Commercial</u>	<u>Industrial</u>	<u>Total</u>
		(a)	(b)	(c)	(d)
01-Oct-05	01-Nov-05	\$0			
01-Nov-05	01-Dec-05	\$19,546	778,585,719	359,318,987	1,137,904,706
01-Dec-05	01-Jan-06	\$29,640	978,705,743	432,086,632	1,410,792,375
01-Jan-06	01-Feb-06	\$16,947	1,028,036,251	405,367,737	1,433,403,988
01-Feb-06	01-Mar-06	\$12,065	843,652,602	294,413,865	1,138,066,467
01-Mar-06	01-Apr-06	\$11,986	933,919,411	266,643,174	1,200,562,585
01-Apr-06	01-May-06	\$10,189	770,406,601	219,377,281	989,783,882
01-May-06	01-Jun-06	\$10,392	696,687,915	197,587,921	894,275,836
01-Jun-06	01-Jul-06	<u>\$12,469</u>	<u>776,022,038</u>	<u>224,661,702</u>	1,000,683,740
(1)	October 2005 - June 2006	\$123,235	6,806,016,280	2,399,457,299	9,205,473,579
(2)	Monthly Average (over 8 months)	\$15,404			
(3)	Percentage of Total Default Service kWh		73.93%	26.07%	
(4)	November 2006 - April 2007 (6 months)		\$68,335		
(5)	November 2006 - January 2007 (3 months)			\$12,046	

- (1) Sum of monthly amounts in respective columns
- (2) Column (a), Line (1) ÷ 8
- (3) Column (b) ÷ Column (d) and Column (c) ÷ Column (d)
- (4) Column (a), Line (2) x Column (b), Line (3) x 6 months
- (5) Column (a), Line (2) x Column (c), Line (3) x 3 months

Information Request DTE 1-3

Request:

Please provide an estimate of the GIS-related costs that MECo will seek to recover in its next reconciliation filing through its amended default service adjustment provision, M.D.T.E. No. 1102, and identify the period for which recovery will be sought. Include all supporting workpapers and calculations.

Response:

The Company will seek recovery of the actual GIS costs incurred to date as itemized in the attachment to Information Request DTE 1-1 plus amounts associated with the months of July 2006 through September 2006. The Company's current default service reconciliation is for the reconciliation period of October 2005 through September 2006, and therefore the GIS costs to be reflected in the reconciliation will be for the same period. The average monthly assessment for GIS based on the actual costs incurred to date is approximately \$15,000. Increasing the actual amounts shown on the attachment to Information Request DTE 1-1 by \$45,000 (\$15,000 per month times 3 additional months) would result in an estimated GIS cost for the reconciliation period of \$168,000.

The Company anticipates making its annual rate filing in January 2007 for rates to become effective March 1, 2007. These rates, including the default service adjustment factor, the mechanism that would recover GIS costs, would be in effect for a 12-month period.

Prepared by or under the supervision of: Theresa M. Burns

Information Request DTE 1-4

Request:

Please supply a chronological summary of all requests to the Department to recover GIS costs. In your summary, include: (1) the date of the request; (2) the period for which recovery was requested; (3) the dollar amount requested to be recovered; (4) the rate or mechanism through which the costs would be recovered; and (5) the status of the request.

Response:

The Company has requested recovery of GIS costs or made reference to GIS cost recovery as part of several submissions to the Department.

On November 1, 2002, as part of its Renewable Energy Portfolio Compliance Plan filed in D.T.E. 99-60 and D.T.E. 00-67, the Company proposed revisions to its Default Service Adjustment Provision (and its Standard Service Cost Adjustment Provision which was in effect at the time) for the purpose of recovering GIS costs. In this filing, the Company proposed to redefine the cost of providing Default Service to include GIS costs by broadening the scope of Default Service costs subject to reconciliation. Specific language proposed to accomplish this was "compliance with current or future statutes, rules or regulations which confer an obligation upon the Company and that is directly related to the Company's requirement to provide Default Service."

The Company renewed its request for approval of the tariff revision in its November 27, 2002 retail rate reconciliation and adjustment filing for calendar year 2003 in D.T.E. 02-79 ("2003 Rate Reconciliation Filing"). On December 16, the Office of the Attorney General submitted comments in D.T.E. 02-79, asking the Department to reject the proposed changes to the Default Service Adjustment Provision on the grounds that Default Service was "common to all electric utilities and should be addressed generically." In order to avoid potentially delaying the Department's timely approval of the Company's proposed January 1, 2003 rate adjustments, the Company withdrew the proposed tariff change without prejudice by letter dated December 17, 2002. In the 2003 Rate Reconciliation Filing, the Company indicated that it had been billed approximately \$534,000 in GIS costs to date. Some of these costs were eventually addressed in the November 18, 2004 Retail Rate Settlement described below.

On February 28, 2003, the Company again requested revisions to its Default Service Adjustment Provision to allow recovery of GIS costs to take effect April 1, 2003. At that time, the Department indicated that certain issues surrounding the provision of Default Service would be addressed in its upcoming order in D.T.E. 02-40 regarding the recovery of costs associated with providing Default Service, which the Department did in D.T.E. 02-40-B. In the Company's January 20, 2004 filing in D.T.E. 03-88E, pertaining to the recovery of administrative costs associated with Default Service, the Company identified at the time that ISO-NE was not currently billing the Company for GIS costs (Testimony of Michael J. Hager at 9), but that the Company could incur CIS costs in the future (Testimony of Theresa M. Burns at 8).



Information Request DTE 1-4 (continued)

On October 8, 2003 the Company again requested approval of revisions to the Default Service Adjustment Provision consistent with the directives of D.T.E. 02-40-B. The Company's proposed revisions would have allowed for the recovery of certain wholesale costs, such as the costs of complying with RPS and related GIS costs. The Department did not act on this filing. On November 14, 2003, the Company submitted a revised Default Service Adjustment Provision to the Department for approval. This proposal was narrower, and included payments to Default Service suppliers, including ISO-NE for procuring Default Service power, and the cost of acquiring renewable energy certificates or remitting Alternative Compliance Payments to comply with RPS requirements. It did not state, as the October 9, 2003 proposal had, that the Company could collect costs related to compliance with current or future statutes, rules, or regulations which confer an obligation upon the Company directly related to the Company's obligation to provide Default Service, and any other third-party costs reasonably incurred and directly related to the Company's obligation to provide Default Service, including the ISO-NE. The Company stated that it would propose recovery of these costs to the Department at the appropriate time in the future. The Department docketed the revised proposal as D.T.E. 03-122, and approved it on December 22, 2003 following a comment period.

On November 21, 2003 the Company made an Exogenous Event Filing pursuant to its Rate Plan Settlement which the Department approved in D.T.E. 99-47. The Department docketed this filing as D.T.E. 03-124. In this filing, the Company was seeking Department approval to recover GIS costs of approximately \$327,000 for the period October 2002 through September 2003 as an exogenous event as part of its overall cost of complying with the Renewable Portfolio Standards. Please refer to the discussion of the November 18, 2004 Retail Rate Settlement, below, for the disposition of this request.

On November 18, 2004, the Company requested Department approval of a Retail Rate Settlement it had entered into with the Office of the Attorney General regarding dockets D.T.E. 02-79, D.T.E. 03-124, and D.T.E. 03-126. This comprehensive settlement, which resolved various outstanding wholesale and retail rate issues, was approved by the Department on December 29, 2004. As part of this settlement, the Company was allowed to recover GIS costs incurred from October 2002 through February 2005. Pertinent provisions of the settlement are as follows:

The costs of compliance with renewable portfolio standards and payments to third parties incurred as a result of Mass. Electric's provision of Standard Offer Service as estimated on lines 1 through 5 of Attachment 3 shall be included in the deferral account and recovered under Section 2(c) of this Settlement and treated in the same manner as other costs included in this deferral account. (§ 2(b) of the settlement)

Information Request DTE 1-4 (continued)

Mass. Electric shall defer and recover beginning in 2010, with a return equal to its customer deposit rate, the costs detailed in Attachment 3 to this Settlement. Attachment 3 includes all items associated with the proposed recovery of supply-related costs incurred under the contracts and contractual disputes that are listed in Attachment 2, which were included in Mass. Electric's Exogenous Factor filing in Docket D.T.E. 03-124. (§ 2(c) of the settlement)

Attachment 3, which is provided as an attachment to this response for ease of reference, only reflected actual and estimated costs for the period October 2002 through February 2005. Pre-October 2002 costs, some of which were included in the \$534,000 in costs cited in D.T.E. 02-79, were not recovered. In addition, the Company did not make changes to its tariff provisions, as the settlement dictated the treatment of GIS costs up through February 2005.

Prepared by or under the supervision of: Legal Department

Massachusetts Electric Company  
Nantucket Electric Company

Summary of Supply Related Costs  
Listed in Possible Settlement  
Actual and Estimated

Cost Category		October 2002- September 2003	October 2003- August 2004	September 2004 - February 2005	Total	Reimbursement via Standard Offer Invoice	Net
		(a)	(b)	(c)	(d)	(e)	(f)
(1)	GIS Costs	\$326,889	\$183,895	\$22,578	\$533,363	n/a	\$533,363
(2)	Congestion Costs	\$1,832,992	\$2,656,884	\$1,483,167	\$5,973,043	n/a	\$5,973,043
(3)	Post-SMD ISO Costs						
	Supplier 1	\$1,460,666	(\$5,916)	\$0	\$1,454,751	\$1,638,962	(\$184,211)
	Supplier 2	\$1,180,253	\$704,856	\$176,214	\$2,061,324	n/a	\$2,061,324
	Supplier 3	\$0	(\$774,735)	(\$238,380)	(\$1,013,116)	n/a	(\$1,013,116)
	Total	\$2,640,919	(\$75,795)	(\$62,166)	\$2,502,959	\$1,638,962	\$863,997
(4)	RPS Costs	<u>\$1,880,221</u>	<u>\$3,072,134</u>	<u>\$10,290,056</u>	<u>\$15,242,411</u>	n/a	<u>\$15,242,411</u>
(5)	Total	\$6,681,021	\$5,837,119	\$11,733,635	\$24,251,775	\$1,638,962	\$22,612,814
(6)	Estimated 2003 SO Deferral Not Recovered by end of 2004				\$7,254,994		\$7,254,994
(7)	Estimated SO Deferral at February 28, 2005				<u>\$36,491,551</u>		<u>\$36,491,551</u>
(8)	Estimated Balance in SO Deferral Account at February 28, 2005				\$67,998,320		\$66,359,359

- (a) DTE 03-124, Exhibit MJH-5, Amounts Billed to Mass. Electric by ISO-NE  
(b) Current amounts billed to Mass. Electric by ISO-NE through July 2004.  
(c) Estimates based on costs incurred to date.  
(d) Column (a) + Column (b) + Column (c)  
(e) DTE 03-124, Exhibit MJH-5, Amounts Withheld from Supplier 1 Bill plus additional amounts during October 2003 - February 2004 period.  
(f) Column (d) - Column (e)

Line (5) Sum of Lines (1) through (4)

Line (8) Sum of Lines (5) through (7)

Information Request DTE 1-5

Request:

Please provide a brief description of the rules governing the allocation and billing of GIS costs from its inception to the present. Include the effective date of each change in the rules, a reference to where the rule is found, and the Federal Energy Regulatory Commission docket number that approved each change.

Response:

NEPOOL has only approved one set of cost allocation rules relating to the NEPOOL GIS. These rules, a copy of which is attached, were approved at the June 21, 2002 NEPOOL Participants Committee Meeting. Under the approved rules, ISO-NE assesses the GIS costs to load that is subject to "Attribute Laws." "Attribute Laws" are defined in the "Allocation of Costs Related to Generation Information System," approved by the NEPOOL Participants Committee in June of 2002, as any statutes, regulations, or orders or decisions of courts and governmental agencies in effect in New England requiring (i) the disclosure of the fuel source, emissions and/or other attributes of the generation used in providing electric service to retail customers, (ii) the inclusion of specified amounts of generation with particular attributes in the generation used in providing electric service to retail customers, and/or (iii) the use of generation falling within specified emission limits to serve retail customers. The Company's Default Service load is subject to Attribute Laws due to its obligation to comply with the renewable portfolio standards ("RPS"), as provided in Mass. Gen. Laws c. 25A, § 11F and 225 C.M.R. 14.00, and to provide information disclosure labels to its Default Service customers pursuant to 220 C.M.R. 11.06.

The Eightieth Agreement amending the NEPOOL Agreement, which was filed by NEPOOL on October 26, 2001 and accepted by the Federal Energy Regulatory Commission in ER02-183-000 on November 28, 2001, revised the Restated NEPOOL Agreement and the NEPOOL Billing Policy to address the allocation and payment of the costs incurred for the development, implementation, and ongoing operation and administration of the NEPOOL GIS. This tariff gives ISO-NE responsibility to assess the GIS costs.

Prepared by or under the supervision of: Michael J. Hager

## **Allocation of Costs Related to Generation Information System**

### **1. Definitions**

Capitalized terms not otherwise defined herein have the meanings given to them in the Restated NEPOOL Agreement (including the Restated NEPOOL Open Access Transmission Tariff and the Market Rules and Procedures).

“Attribute Laws” are any statutes, regulations or orders or decisions of courts and governmental agencies in effect in New England requiring (i) the disclosure of the fuel source, emissions and/or other attributes of the generation used in providing electric service to retail customers, (ii) the inclusion of specified amounts of generation with particular attributes in the generation used in providing electric service to retail customers, and/or (iii) that generation falling within specified emission limits be used to serve retail customers. The Attribute Laws as of March 8, 2002 include, but are not necessarily limited to, those set forth on Appendix A hereto. Not all retail load serving entities in a state with an Attribute Law are necessarily subject to that Attribute Law.

“GIS Load” for any GIS Participant is, for any month, the sum of the meter readings in such month for all GIS Load Assets owned by that GIS Participant.

A “GIS Load Asset” is any Load Asset registered with the System Operator which (x) is owned by a Participant that either is subject to an Attribute Law with respect to that specific Load Asset, or (y) is owned by a Participant that supplies power for that Load Asset directly to a non-Participant that is in turn subject to an Attribute Law with respect to that specific Load Asset, or (z) is owned by a Participant that supplies power for that Load Asset directly to a Participant that is in turn subject to an Attribute Law with respect to that specific Load Asset; provided, however, that any GIS Load Asset owned by a Participant that supplies power for that Load Asset directly to a Participant that is in turn subject to an Attribute Law with respect to that specific Load Asset, as described in clause (z) above, shall, for purposes of determining the amount of GIS Costs that are attributable to Participants hereunder, be deemed to be owned by the Participant that is subject to an Attribute Law with respect to that Load Asset. Each Load Asset shall be presumed to be a GIS Load Asset unless it is identified otherwise pursuant to the provisions of section 2 below.

A “GIS Participant” is any Participant that owns one or more GIS Load Asset(s). No Governance Only Member will be deemed to be a GIS Participant.

“GIS Costs” are all of the expenses incurred by NEPOOL in any given month in connection with its generation information system, including without limitation all amounts payable by NEPOOL to the entity or entities that develop, administer, operate and maintain that generation information system and to the project manager for that generation information system.

“Subcommittee” is the NEPOOL Budget and Finance Subcommittee or any other group or committee designated by the Participants Committee to serve the functions of the Subcommittee hereunder.

## **2. Identification of GIS Load Assets**

- a) Every Load Asset will be deemed to be a GIS Load Asset, subject to the allocation and payment procedures described herein, unless the Participant that owns that Load Asset certifies to the Subcommittee, in accordance with this section 2, that such Load Asset is not a GIS Load Asset.
- b) To demonstrate that any Load Asset owned by it is not a GIS Load Asset, on an annual basis and whenever the Subcommittee or the System Operator deems necessary, a Participant shall provide the Subcommittee, either a certification by an officer of that Participant (a “Certification”) or an opinion of counsel to that Participant (an “Opinion”) explaining the specific reason or reasons why such Load Asset is not a GIS Load Asset; provided, however, that the System Operator or the Subcommittee may specifically require a Participant claiming any Load Asset is not a GIS Load Asset to provide either a Certification or an Opinion. Each such Certification or Opinion shall include, for each Load Asset covered thereby, an asset identification number, the state in which the load associated with that Load Asset is situated, and the specific reason why such Load Asset is not a GIS Load Asset. Conclusory statements that a Load Asset is not a GIS Load Asset without an adequate explanation shall not satisfy the requirements of this provision. The Subcommittee shall periodically provide the System Operator with a list of the Load Assets, by asset identification number, which have been demonstrated to the satisfaction of the Subcommittee not to be GIS Load Assets.
- c) Beginning with the month immediately before the first month in which the System Operator begins billing and collecting GIS Costs based on this procedure, the certification or opinion of counsel described in paragraph (b) above must be provided by a Participant to the Subcommittee by the 20th day of the month in order for that Participant to avoid being allocated a portion of the GIS Costs in the following month, and subject to paragraph (d) below, all subsequent months of that same calendar year in which the Participant does not own any GIS Load Assets. Participants that do not own Load Assets are not required to submit an Opinion or Certification. In addition, each Participant that owns a Load Asset and expects not to be charged a portion of the GIS Costs under this procedure shall provide its Certification or Opinion to the Subcommittee by July 20, 2002, if it has not already done so.
- d) Each Participant shall notify the Subcommittee immediately if any Load Asset owned by it becomes a GIS Load Asset as a result of either a change in law or a change in the nature of such Load Asset.

- e) The System Operator will periodically (and no less frequently than annually) publish to all of the Participants and to the utility regulatory agencies in each of the New England states (via the System Operator's website and/or direct electronic mail) a listing, by asset identification number, owning Participant and state, of all of the GIS Load Assets and all of the Load Assets that are not GIS Load Assets. That listing will also identify the Load Assets that are related solely to station service.
- f) Any Participant may challenge whether a Load Asset is a GIS Load Asset by requesting that the Participants Committee find that such Load Asset is or is not a GIS Load Asset, including in such request the specific reasons for its challenge. Any finding to such effect by the Participants Committee shall be subject to the usual voting and appeal requirements with respect to actions by the Participants Committee.

### 3. Allocation of Costs to GIS Participants

The amount of GIS Costs being allocated on a GIS Participant's bill in any month will be based on its GIS Load in the previous month. This monthly allocation of GIS Costs to each GIS Participant ("Participant GIS Cost") will be calculated as follows:

$$\text{Participant GIS Cost} = \text{GIS Costs} * \frac{\text{GIS Load of that GIS Participant}}{\sum (\text{GIS Loads of all GIS Participants})}$$

- b) Except in the case of a potential error made in the allocation of any month's GIS Costs that is initially identified to the System Operator within 90 days of the initial allocation, the allocation of the GIS Costs among the GIS Participants in any month will be final and not subject to resettlement.
- c) All GIS Costs incurred by NEPOOL and paid by the Participants prior to the effectiveness of the procedure set forth herein, together with interest accrued thereon, will be allocated among the GIS Participants and paid by the GIS Participants to the Participants initially paying such GIS Costs in the first month in which GIS Costs are allocated according to the procedure set forth herein.

Appendix A

Attribute Laws

Connecticut

Conn. Gen. Stat. §16-6c  
Conn. Gen. Stat. §16-245a  
Conn. Gen. Stat. §16-245p  
Conn. Gen. Stat. §22a-174j;  
Conn. Agencies Regs. §16-245-5

Maine

Me. Rev. Stat. Ann. §3210  
Code Me. R. §65-407-306

Massachusetts

Mass. Gen. L. ch. 25A, §11D  
Mass. Gen. L. ch. 25A, §11F  
Mass. Gen. L. ch. 111, §142N  
Mass. Regs. Code tit. 220, §11.06

New Hampshire

No Attribute Laws at this time

Rhode Island

R.I. Regs. Code §90-000-016

Vermont

No Attribute Laws at this time